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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

Della Kamkoff, John Andrew, Kayla Birch,  
Rose Carney, Tereresa Ferguson, Zoya  
Jenkins, Troy Fender, Rhonda Conover,  
Autumn Ellanna, and Nataliia Moroz, on  
behalf of themselves, and all those similarly  
situated,

*Plaintiffs,*

v.

Heidi Hedberg, in her official capacity As  
Commissioner of the Alaska Department of  
Health.

*Defendant.*

Case No. 3:23-cv-00044-SLG

**PLAINTIFFS' NOTICE OF  
DEPOSITION OF STATE OF  
ALASKA DEPARTMENT OF  
HEALTH**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, the Plaintiffs will take the deposition of Defendant State of Alaska, Department of Health, on April 14, 2025, commencing at 9:00 a.m., AST, through the designees identified to testify regarding the topics identified below. The deposition will take place remotely (via video conference). The deposition will take place before an officer authorized to administer oaths and shall take place day to day until completed, should the

PLAINTIFFS' NOTICE OF DEPOSITION OF STATE OF ALASKA DEPARTMENT OF HEALTH

*Della Kamkoff et. al. v. Heidi Hedberg*; Case No. 3:23-cv-00044-SLG

Page 2 of 10

Defendant designate more than one deponent to testify regarding the topics included below. The deponent and its counsel may be provided with various exhibits, at or before the deposition, which the deponent will be questioned on. The deposition will be recorded and transcribed.

The Defendant is requested to provide Plaintiffs' counsel with written notice, at least five business days in advance of any deposition, of the name and employment position of each designee who is to testify on the Defendant's behalf and the subject matter categories as to which each such designee will testify. The Defendant must confer with Plaintiffs' counsel regarding the matters for examination promptly upon receiving this notice.

PLEASE TAKE FURTHER NOTICE that, to the extent that any documents, as defined by Rule 34(a)(1) of the Federal Rules of Civil Procedure, exist that are identifiable based on the topics below, the Defendant is required, pursuant to Rule 30 of the Federal Rules of Civil Procedure, to bring such documents to the deposition.

The subject matter for the deposition will include:

1. Supplemental Nutrition Assistance Program ("SNAP") application procedures, including but not limited to:
  - a. All mechanisms or methods through which application forms can be accessed or obtained by members of the public;
  - b. Changes made since 2021 to mechanisms or methods through which SNAP application forms can be accessed or obtained by members of the public;

- c. All mechanisms or methods through which application forms and verification documents can be submitted by applicant households to Defendant;
  - d. Changes made since 2021 to mechanisms or methods through which application forms and verification documents can be submitted by applicant households to Defendant; and
  - e. Processes for ensuring that federal application processing times are met, including internal mechanisms or methods for tracking timeliness.
2. Tracking receipt and status of applications and recertification applications for SNAP benefits including but not limited to:
- a. Time that passes without an eligibility decision on an application/recertification; and
  - b. Circumstances under which an application is pended.
3. Pending applications for SNAP, including:
- a. Reasons why a SNAP application may be pended,
  - b. The number of applications pended due to each reason;
  - c. The point in the eligibility determination process at which a SNAP applicant is advised their application or recertification is pending;
  - d. How information about a pending SNAP application or recertification is conveyed to the SNAP household; and
  - e. The required notice of SNAP delayed processing.

4. SNAP eligibility determinations, including:
  - a. Actions that Division of Public Assistance (“DPA”) takes to determine the eligibility of an applicant for SNAP benefits, including the duration these actions take; and
  - b. Any changes in these processes since this lawsuit was filed.
5. Telephonic Applications for SNAP pursuant to waiver from the Food and Nutrition Service of the United States Department of Agriculture, including:
  - a. The decision by DPA to apply for the waiver, both initially and on renewal;
  - b. The process of applying for the waiver, both initially and on renewal;
  - c. Reporting to FNS regarding the waiver;
  - d. Communications from FNS regarding the waiver;
  - e. The tracking and compilation of performance data relevant to the waiver;
  - f. Training DPA employees to take telephonic applications; and
  - g. Information shared publicly about the option to make a telephonic application for SNAP.
6. SNAP interviews, including:
  - a. The process by which SNAP interviews are scheduled;
  - b. The administration of SNAP interviews; and
  - c. Making decisions about SNAP interview waivers.
7. SNAP application backlog, including:
  - a. What happens to a SNAP application while in the backlog queue;

- b. What evaluation of the application takes place before it is placed in the queue;
  - c. How are applications removed from the backlog queue;
  - d. How long applications have remained in the backlog queue and currently remain in the queue; and
  - e. How the applications in the backlog queue are tracked.
8. Reasons for delays and/or backlogs in making SNAP eligibility decisions, as well as the number of eligibility decisions delayed or backlogged due to each reason.
9. Operation of DPA offices since 2021, including but not limited to:
- a. Hours of operation and hours open to the public for in-person services;
  - b. DPA office closures, before, during, and after the onset of the COVID-19 pandemic;
  - c. Reopening of previously-closed offices;
  - d. Who is involved in decisions about DPA office closures and reopenings;
  - e. How DPA office closures and reopenings are determined;
  - f. Work from home policies and practices applicable to DPA workers who assist people seeking SNAP and process SNAP applications and recertifications;
  - g. Availability of face-to-face SNAP interviews at DPA offices, including any process for tracking and responding to requests for face-to-face SNAP interviews; and

- h. Any plans and/or activities to change the hours of operation or hours open to the public at any DPA offices.
- 10. Staffing levels in the DPA at the Department of Health since 2020, including but not limited to:
  - a. Staffing levels on the Virtual Contact Center (“VCC”) and in DPA offices;
  - b. The work duties of those staff;
  - c. The hiring of additional workers to work in the VCC and DPA offices; and
  - d. The reassignment of workers within DPA to work in the VCC and DPA offices.
- 11. The manner in which data regarding the timely processing of SNAP applications and recertification is collected, maintained, and reported by and for the Defendant, including but not limited to preparation of the documents titled:
  - a. “Distribution of Application Age by Program for Application in Backlog”;
  - b. “Average Age of Unacted Applications by Program”;
  - c. “Backlog Applications / Recertifications”;
  - d. “Alaska DH&SS – Division of Public Assistance Internal Performance Measures: ...”;
  - e. “Alaska SNAP Backlog Tracker” and “Alaska SNAP Backlog Tracker New Format”;
  - f. “FNS APT Report”;
  - g. “SNAP APT by Month”;

- h. “SNAP Workload Tracker”;
  - i. “SNAP and Medicaid Backlog by Month”.
12. The manner in which data regarding the VCC is collected, maintained, and reported by and for the Defendant, including but not limited to preparation of the documents titled “VCC Metrics”.
13. Ways that Defendant contends that it could more promptly render SNAP eligibility determinations.
14. Ways that Defendant contends that it has improved or tried to improve the speed of its SNAP eligibility determinations.
15. The procedures and processes used to search for and produce documents and information responsive to Plaintiff's discovery requests, including all search terms used, search techniques and methods; processes for identifying, reviewing and producing responsive information; and the custodians, personnel, and employees involved.

DATED this 6<sup>th</sup> of March, 2025.

Attorneys for Plaintiffs

/s/ Nicholas Feronti

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**Certificate of Service**

I hereby certify that on March 6, 2025, true and correct copies of the foregoing document were served on all parties via the CM/ECF electronic filing system or email.

/s/ Nicholas Feronti

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PLAINTIFFS' NOTICE OF DEPOSITION OF DEB ETHERIDGE  
*Della Kamkoff et. al. v. Heidi Hedberg*; Case No. 3:23-cv-00044-SLG  
Page 1 of 4

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

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behalf of themselves, and all those similarly  
situated,  
*Plaintiffs,*

v.

Heidi Hedberg, in her Official Capacity as  
Commissioner of the Alaska Department of  
Health.  
*Defendant.*

Case No. 3:23-cv-00044-SLG

**NOTICE OF DEPOSITION OF DEB ETHERIDGE**

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Plaintiffs, by and through their attorneys the Northern Justice Project, the National Center for Law and Economic Justice, and DLA Piper, LLP, will take the

PLAINTIFFS' NOTICE OF DEPOSITION OF DEB ETHERIDGE  
*Della Kamkoff et. al. v. Heidi Hedberg*; Case No. 3:23-cv-00044-SLG

Page 2 of 4

deposition upon oral examination of Deb Etheridge on April 8, 2025 remotely (via video conference), commencing at 9:00 AM AKT / 1:00 PM EST before a notary public or other officer duly authorized to administer oaths. The deposition will continue from day to day until its completion and shall be recorded stenographically.

Dated: March 18, 2025  
New York, New York

Saima Akhtar

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*Della Kamkoff et. al. v. Heidi Hedberg*; Case No. 3:23-cv-00044-SLG

Page 3 of 4

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**Certificate of Service**

I hereby certify that on March 18, 2025, a true and correct copies of Plaintiffs' Notice of Deposition of Deb Etheridge was served on Defendant via electronic mail to her counsel of record Lael Harrison, [lael.harrison@alaska.gov](mailto:lael.harrison@alaska.gov), Justin Nelson, [justin.nelson@alaska.gov](mailto:justin.nelson@alaska.gov), and David Wilkinson, [david.wilkinson@alaska.gov](mailto:david.wilkinson@alaska.gov).

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IN THE UNITED STATES DISTRICT COURT

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v.

Heidi Hedberg, in her official capacity As  
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*Defendant.*

Case No. 3:23-cv-00044-SLG

**PLAINTIFFS' NOTICE OF  
DEPOSITION OF KATE  
SHEEHAN**

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Plaintiffs, by and through their attorneys the Northern Justice Project, the National Center for Law and Economic Justice, and DLA Piper, LLP, will take the deposition upon oral examination of Kate Sheehan on April 10, 2025 at the offices of the Northern Justice Project, LLC, which are located at 406 G Street, Suite 207, Anchorage,



AK 99501. The deposition will commence at 9:00 AM AKT before a notary public or other officer duly authorized to administer oaths. The deposition will continue from day to day until its completion and shall be recorded stenographically.

DATED this 6<sup>th</sup> of March, 2025.

Attorneys for Plaintiffs

/s/ Nicholas Feronti

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/s/ Nicholas Feronti

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Case No. 3:23-cv-00044-SLG

**PLAINTIFFS' NOTICE OF  
DEPOSITION OF TRACIE  
DABLEMONT**

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Plaintiffs, by and through their attorneys the Northern Justice Project, the National Center for Law and Economic Justice, and DLA Piper, LLP, will take the deposition upon oral examination of Tracy Dablemont on April 2, 2025 remotely (via video conference), commencing at 9:00 AM AKT before a notary public or other officer duly

PLAINTIFFS' NOTICE OF DEPOSITION OF TRACIE DABLEMONT

*Della Kamkoff et. al. v. Heidi Hedberg*; Case No. 3:23-cv-00044-SLG

Page 2 of 5

authorized to administer oaths. The deposition will continue from day to day until its completion and shall be recorded stenographically.

DATED this 6<sup>th</sup> of March, 2025.

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**Certificate of Service**

I hereby certify that on March 6, 2025, true and correct copies of the foregoing document were served on all parties via the CM/ECF electronic filing system or email.

/s/ Nicholas Feronti



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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

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Ellanna, and Nataliia Moroz, on behalf of )  
themselves, and all those similarly situated, )

Plaintiffs, )

v. )

Case No.: 3:23-cv-00044-SLG

Heidi Hedberg, in her official capacity as )  
Commissioner of the Alaska Department of )  
Health, )

Defendant. )

**SUPPLEMENTAL PRODUCTION**

Pursuant to Federal Rules of Civil Procedure 26 and 34, the defendant supplements her responses to the plaintiffs' first and second requests for production with responsive documents are attached at Bates Nos. SOA032865- SOA032975.

DATED: August 18, 2025.

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I certify that on August 18, 2025, the foregoing  
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*John Andrew et. al. v. Heidi Hedberg*  
Supplemental Production

Case No.: 3:23-cv-00044-SLG  
Page 3 of 3